

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

v.

Criminal No. 19-331

SUE O'NEILL,

STIPULATION

The United States of America, and Marco Contractors, Inc., by and through their respective counsel, with the intent to be legally bound hereby, stipulate and agree as follows:

1. On or around October 31, 2019, a seven-count Information was filed against Sue O'Neill charging her with 18 U.S.C. § 1343 (wire fraud) and 26 U.S.C. § 7206(1) (filing a false income tax return).

2. As part of the case against Sue O'Neill, the United States sought to forfeit, among other things, two Pittsburgh Steelers Season Tickets Seat Licenses, Account Number 7926279, Section 117, Row N, Seats 3 & 4, delineated by asset identification number 20-FBI-001409 (the "Ticket Licenses").

3. On November 13, 2019, Sue O'Neill entered a guilty plea to Counts One and Seven of the Information at Criminal No. 19-331.

4. As part of her guilty plea, Sue O'Neill agreed to forfeit all right, title, and interest in the Ticket Licenses.

5. The United States subsequently obtained a Preliminary Order of Forfeiture for, among other things, the Ticket Licenses.

6. On or around September 10, 2020, Sue O'Neill was sentenced and her Judgment

included the forfeiture of the Ticket Licenses.

7. The United States conducted ancillary forfeiture proceedings so that third-party interests could be adjudicated in accordance with 21 U.S.C. § 853(n).

8. Beginning on January 28, 2020, the United States advertised notice of this forfeiture proceeding for 30 days, and a declaration of publication is on file with the Court.

9. Marco Contractors, Inc., through its attorney, has indicted that it has a right to the Ticket Licenses.

10. No other claims have been filed for the Ticket Licenses, and the time for filing claims has expired. As such, the only parties who have asserted any ownership rights to the Ticket Licenses are the United States and Marco Contractors, Inc.

11. The United States and Marco Contractors, Inc. enter into this Stipulation in complete settlement and full satisfaction of any and all right, title and/or interest of Marco Contractors, Inc. in the Ticket Licenses.

12. The United States will relinquish its rights, title and interest in the Ticket Licenses to Marco Contractors, Inc., free and clear of any forfeiture rights of the United States.

13. Marco Contractors, Inc. hereby releases and forever discharges the United States, its agents, servants, employees and assigns from any and all actions, causes of action, suits, proceedings, debts, dues, contracts, judgments, damages, claims and/or demands which Marco Contractors, Inc., or its assigns, now have or may hereafter acquire against the United States, its agents, assigns, employees and servants, with regard to any and all issues related to Ticket Licenses.

14. This Stipulation is subject to the approval of the United States District Court.

15. The parties respectfully request that the United States District Court enter a certificate of reasonable cause pursuant to 28 U.S.C. § 2465 as part of the Order approving the Stipulation.

With the intent to be legally bound hereby, the undersigned execute this Stipulation this

31 day of August, 2021:

Respectfully submitted,

STEPHEN R. KAUFMAN
Acting United States Attorney



LEE J. KARL
Assistant United States Attorney
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
412-894-7488 (tel)
412-644-2644 (fax)
lee.karl@usdoj.gov
PA ID No. 87856



CHRISTOPHER CAFARDI
Attorney for Marco Contractors, Inc.